

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA §  
§  
V. § CRIMINAL NO. 4:22-CR-00110  
§  
ERIC REED MARASCIO §

**UNOPPOSED MOTION FOR CONTINUANCE OF DETENTION HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, ERIC REED MARASCIO, by and through undersigned counsel and files this Unopposed Motion for Continuance of Detention Hearing. In support of said motion, Defendant would show unto the Court as follows:

I.

The above styled cause is currently set for a Detention Hearing on May 24, 2022, at 10:00 a.m., before the Honorable Kimberly C Priest Johnson.

II.

Undersigned counsel was appointed to represent Mr. Marascio on May 18, 2022 and has received the pretrial services report. Undersigned counsel has a conflict with that date since he is set for sentencing at 9:00 a.m. in the 296<sup>th</sup> District Court Collin County, Texas in the matter of State of Texas v. Phillip Carter. The hearing is expected to last all day and would cause inconvenience to the all the parties if it had to be reset. Furthermore, counsel requests more time to prepare for the detention hearing in order to render effective of assistance of counsel and effectively rebut the Pretrial officer's recommendation.

III.

This Unopposed Motion for Continuance of Detention Hearing is not made for purposes of delay, but only in order that justice may be done.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests this Honorable Court to grant this Unopposed Motion for Continuance of Detention Hearing, set for May 24, 2022 to May 31, 2022.

Respectfully submitted,

WHALEN LAW OFFICE

/s/ James P. Whalen  
JAMES P. WHALEN  
TEXAS BAR CARD NO. 00794837  
9300 John Hickman Parkway, Suite 501  
Frisco, Texas 75035  
Telephone: (214) 368-2560  
Facsimile: (972) 829-8654  
[jwhalen@whalenlawoffice.com](mailto:jwhalen@whalenlawoffice.com)  
COUNSEL FOR DEFENDANT  
ERIC REED MARASCIO

**CERTIFICATE OF CONFERENCE**

This is to certify that on the 20th day of May 2022, undersigned counsel contacted the Assistant United States Attorney in charge of this case, Anand Varadarajan, who stated that the Government does not oppose this motion.

/s/ James P. Whalen  
JAMES P. WHALEN

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing motion was delivered to Anand Varadarajan, the Assistant United States Attorney in charge of this case, via CM/ECF, on this the 23<sup>rd</sup> day of May 2022.

/s/ James P. Whalen  
JAMES P. WHALEN